

To whom it may concern:

I am writing this letter in regards to the expansion of Nevada Cement Company in Fernley Nevada. I am expressing my opinion not only as an employee of Nevada Cement, but also as a concerned citizen. Nevada Cement has been in Fernley for over 40 years and has helped Fernley grow from a very small town to what it is now. Nevada Cement employs around 100 employees, with the possibility of more after the expansion, as well as some outside workers at times. I have driven around Fernley recently and noticed that there's a lot of vacant houses and a lot of for sale signs. I would think that the people of Fernley would welcome an expansion with open arms to help get Fernley out of its slump instead of a possible closure of Nevada Cement and possibly 75 more homes vacant from Nevada Cement employees forced to move to find work

Thank You

Bart Pederson

Nevada
Environmental Protection

FEB 08 2008

BAPC / BAQP

2/08/08

To NDEP:

Dear Sirs:

In regards to the Nevada Cement expansion. I don't understand why there is any question at all. Nevada Cement has always strived to get better along the years concerning emissions they have always improved. With that said I lived in Fernley most of my life 37 years and Nevada Cement was always the place to work they paid decent it was either there or Mission Linen or one of the gas stations. I do not think just because Fernley now has other businesses that Nevada Cement is no longer needed. There are still over 100 employees there. Nevada Cement has always been a constant in Fernley other businesses have come and gone they've stayed through the rough times now they need to expand to compete in the market just like everything including Fernley you must grow or die. I would hate to see the plant die it's been a staple in Fernley since 1963 I feel as many others that Nevada Cement deserves to grow along with Fernley.

Thank you,
Helen King

Nevada
Environmental Protection

FEB 08 2008

BAPC / BAQP



Nevada Cement Company

PO Box 840
Fernley Nevada 89408
Phone: 775-575-2281 ext 282

Mr. Tobarak Ullah
Staff Engineer III

Nevada Division of Environmental Protection

Mr. Ullah

As the NAC 445B.3364 notice of public hearing approaches on Monday the 2/11/2008 at the Fernley city hall. I felt that a comment from me was in order. I am the Maintenance Planner for Nevada Cement Company. I was hired January 18th 1999 to write the computerized maintenance management program we current are using as our maintenance system.

Previous to this I have worked in the cement industry since 1972, I have held various positions throughout my employment in this industry. I have spent 27 years at a cement plant located 3 miles from down town Seattle and as you can imagine the extreme difficulties in addressing fugitive dust concerns that we faced there.

As the Maintenance Planner for this company I have had the first hand experience in seeing what we have done in the 9 years the I have been here in regards to maintaining this plant that are needed to meet the required environmental standards in the state of Nevada. We use 27 plant maintenance employees to maintain our equipment to the top condition that gives us the run times that we currently enjoy.

It is my opinion the Nevada Cement Company is committed to meet and exceed all required regulations that we will face with the new plant. It would not make sense to not meet those standards set forth by the state as the financial responsibility involved in building the new plant requires a significant expense on our part to risk being shut down for that.

Thank you
Maxwell R Brassfield
Maintenance Planner
Nevada Cement Company

2/8/2008

Nevada Cement Company

PO Box 840
Fernley Nevada 89408

Phone: 775-575-2282 ext282

Mr. Greg Remer

Nevada Division of Environmental Protection

Bureau Chief

Mr. Remer

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Thank you
Maxwell R Brassfield
Maintenance Planner
Nevada Cement Company

2/8/2008

Matthew DeBurle

From: John Hadder [john@greatbasinminewatch.org]
Sent: Tuesday, February 12, 2008 4:03 PM
To: Matthew DeBurle
Subject: Nevada Cement Class I permit
Attachments: NV Cement Class I permit(2.12.08).pdf

Hello Matthew,

Thank you for taking these comments today. I had assumed incorrectly that the comment period was extended beyond the hearing date.

John Hadder

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John Hadder
Great Basin Resource Watch
85 Keystone, Ste. K
Reno, NV 89503
775-348-1986

john@greatbasinminewatch.org

www.greatbasinminewatch.org

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Great Basin Resource Watch

35 Keystone Ave., Suite K
Reno, NV 89503
775-348-1986
info@greatbasinminewatch.org
www.greatbasinminewatch.org

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John Hadder
Staff Scientist

February 12, 2008

Matthew DeBurle
Nevada Division of Environmental Protection
Bureau of Air Pollution Control
901 South Stewart Street, Suite 4001
Carson City, NV 89701-5249

RE: *Nevada Cement Company Operating Permit to Construct #AP3241-2201 (FIN
#A0030) for a Class I facility.*

Dear Mr. DeBurle,

Great Basin Resource Watch has concerns regarding the potential for this facility to release mercury into the air, and exposure of workers to elevated levels of mercury. It is our understanding that Nevada Cement Company has not had the feedstock limestone analyzed for mercury content. We see this as a necessary first step in the determination of the potential to release mercury. As noted from EPA source documents mercury emissions from cement kilns can vary widely, which has been attributed to variation of mercury in the raw materials.¹ According to EPA calculations based on the amount of mercury in raw material, mercury emissions could vary from a low of 0.09 lbs/day to a high as 16.44 lbs/day. This analysis underscores the need for mercury testing, and not to assume that the mercury content of the raw materials is negligible.

The U.S. EPA has promulgated regulations on mercury emissions from cement kilns in 40 CFR Part 63.1343, "Standards for kilns and in-line kiln/raw mills." Within this regulation it is established for "Reconstructed or new kilns located at major sources:"

No owner or operator of a reconstructed or new kiln or reconstructed or new inline kiln/raw mill located at a facility which is a major source subject to the provisions of this subpart shall cause to be discharged into the atmosphere from these affected sources any gases which: ...

(5) Contain mercury from the main exhaust of the kiln, or main exhaust of the in-line kiln/raw mill, or the alkali bypass in excess of 41µg/dscm if the source is a new or reconstructed source that commenced construction after December 2, 2005. As an alternative to meeting the 41 µg/dscm standard you may route the emissions through a packed bed or spray tower wet scrubber with a liquid-to-gas (l/g) ratio of 30 gallons per 1000 actual cubic feet per minute (acfm) or more and meet a site specific emissions limit based on the measured performance of the wet scrubber.

¹Federal Register, Vol. 71, No. 244, Wednesday, December 20, 2006, pg. 76520.

It is unclear to Great Basin Resource Watch at this time how Nevada Cement is complying with this standard, and which if any Nevada Agencies is enforcing this standard. It appears as though some kind of mercury control and monitoring is required for Nevada Cement, or an analysis demonstrating that mercury emissions could not possibly be at or near the above standard.

We hope your bureau can address this concern.

Sincerely,

A handwritten signature in black ink, reading "John Hadder". The signature is written in a cursive style with a large, looping "J" and a stylized "H".

John Hadder
Staff Scientist